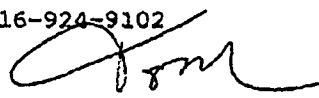


To: Carol Howe, CALFED< Montgomery Watson, FAX 916-924-9102

From: Tom Maurer, U.S. Fish and Wildlife Service 

RE: Comments on Draft Definition of Ecosystem Water Quality Parameter of Concern

Carol,

In an earlier meeting we had discussed some of these but also included professional judgement. Maybe we can add a 4th parameter or use this sentence in setting up the 3 parameters.

(4.) Professional judgement of the WQ technical sub-team based upon available information and using the (above/following) criteria.

QA/QC - I think there is too much involved with the evaluation of QA/QC for us to spend time on defining what constitutes adequate QA/QC for this process. This is where our professional judgement comes in, the use of peer reviewed/published literature, and the use of reports and information generally accepted by the scientific/public community.

Exceedence - The EPA criteria goes on the assumption of "not more than once in 3 year" exceedence rate. Using this alone would increase the parameter list to a size too large to deal with in this process. The use of any criteria/standards in this process should be done carefully and again using best professional judgement. For example selenium concentrations in water could be less than the 5 ppb criteria but still be bioaccumulating in organisms to harmful levels.

Location specific basis vs. systemwide - for the protection of listed species local impacts can be significant so location specific assessments should be considered along with systemwide assessment.

Relevant data - not sure what you mean by this. Just because a control measure is implemented does not mean it is having a desired effect, thus monitoring should continue until the desired effect is consistently achieved, additional control measures introduced, etc. If a desired effect is achieved for 3-5 years and the control measure is permanently in place then monitoring could be scaled back or ended.

Other Issues - I was looking over some of the 8/16/96 tables you prepared and noticed some discrepancies between them and the State of the Estuary tables which they are based upon. I'm not sure whether changes were made after discussions or comments from others or not. For example in table TRACELEM.XLS "biota concn" under cadmium the alert level column says "No, but elevated levels in Bay shellfish". The State of the Estuary table has "Yes, some Bay shellfish exceed MSL". The selenium column is also significantly different. If updated information has been provided then it must be acknowledged in the "Source" footnote.

Also the TRACELEM.XLS "effects" table appears to be accurately copied from the State of the Estuary but I do not think the selenium description accurately describes the current understanding of the effects of selenium. I can provide a better summary if you want.